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August 4, 2022

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Global Gaming Philippines, LLC v. Razon, Jr., et al.*, 21 Cv. 2655 (LGS)(SN)/
Motion for Leave to File Under Seal**

Dear Judge Netburn:

On behalf of Plaintiff Global Gaming Philippines, LLC (“Plaintiff”), and pursuant to (a) the Stipulated Confidentiality Order (ECF No. 95), and (b) confidentiality designations made by counsel for Defendants, we respectfully request leave to file under seal Plaintiff’s Response to Defendants’ Motion to Compel (ECF No. 280) (“Plaintiff’s Response”), and the exhibits thereto.

Plaintiff makes this application because counsel for Defendants have designated the exhibits to Plaintiff’s Response, which are quoted in Plaintiff’s response, as “Confidential” pursuant to the Stipulated Confidentiality Order (ECF No. 95).

Paragraph 11 of the Confidentiality Order provides: “Documents may be filed under seal only as provided in Judge Schofield’s Rule I.D.3,” which provides that the parties with an interest in confidential treatment, here those Defendant parties who designated the document “Confidential,” bear the burden of persuasion. Plaintiff does not concede the confidential designation of the exhibits to Plaintiff’s Response.

Respectfully submitted,

/s/ Kevin N. Ainsworth

Kevin N. Ainsworth
Member / Co-Chair, Cross-Border Asset Recovery Practice

Cc: All counsel of record (via ECF)